

The Honorable Jamal N. Whitehead

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KURT A. BENSHOOF, )  
 ) No. 2:24-cv-00382-JNW  
Plaintiff, )  
v. )  
 ) NOTICE OF APPEARANCE  
DAVID S. KEENAN, )  
 )  
Defendant. )  
\_\_\_\_\_ )

**TO: KURT A. BENSHOOF, Plaintiff;**

**AND TO: CLERK OF THE COURT.**

YOU AND EACH OF YOU will please take notice that Senior Deputy Prosecuting Attorney **SANTIAGO VIOLA VILLANUEVA** hereby appears in the above-entitled action on behalf of Defendant David Keenan without waiving the question of:

1. Lack of jurisdiction over the subject matter;
2. Lack of jurisdiction over the person;
3. Improper venue;
4. Insufficiency of process;
5. Insufficiency of service of process;
6. Failure to state a claim upon which relief may be granted;
7. Fraud;
8. Failure to join a party under Rule 19;
9. Statute(s) of limitation;
10. Qualified immunity; and
11. Doctrine of Laches.

NOTICE OF APPEARANCE  
[No. 3:24-cv-00382-JNW] - 1

**Leesa Manion (she/her)**  
Prosecuting Attorney  
CIVIL DIVISION, Litigation Section  
701 5<sup>th</sup> Avenue, Suite 600  
Seattle, Washington 98104  
(206) 477-1120 Fax (206) 296-0191

1           You are hereby further notified that all further papers and pleadings herein, except for  
2 original process, shall be served upon the undersigned attorneys at the addresses below-stated.

3           DATED this 5<sup>th</sup> day of December, 2024.

4                               LEESA MANION (she/her)  
5                               King County Prosecuting Attorney

6                               By: /s/ Santiago Voila Villanueva  
7                               SANTIAGO VIOLA VILLANUEVA, WSBA #54071  
8                               Senior Deputy Prosecuting Attorney  
9                               Attorney for Defendant Keenan  
10                              701 5<sup>th</sup> Avenue, Suite 600  
11                              Seattle, WA 98104  
12                              Phone: (206) 477-1120/Fax: (206) 296-0191  
13                              [sviolavillanueva@kingcounty.gov](mailto:sviolavillanueva@kingcounty.gov)

1 Attorney's Office  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23

NOTICE OF APPEARANCE  
[No. 3:24-cv-00382-JNW] - 3

**Leesa Manion (she/her)**  
Prosecuting Attorney  
CIVIL DIVISION, Litigation Section  
701 5<sup>th</sup> Avenue, Suite 600  
Seattle, Washington 98104  
(206) 477-1120 Fax (206) 296-0191